

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Administration of the North) CC Docket No. 92-237
American Numbering Plan) Phases One and Two

RECEIVED

JUN 30 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

REPLY COMMENTS OF
SPRINT CORPORATION

Leon M. Kestenbaum
Jay C. Keithley
Norina T. Moy
1850 M St., N.W., Suite 1110
Washington, D.C. 20036
(202) 857-1030

June 30, 1994

No. of Copies rec'd 0+7
List A B C D E

Table of Contents

Summary	iii
I. NANP STRUCTURE ISSUES	1
A. Open Versus Representative Membership ...	2
B. Centralization of CO Code Assignment	3
C. Choice of Sponsor and NANPA	4
II. FUNDING MECHANISM	6
III. USE OF "1" AS UNIFORM TOLL INDICATOR	8
IV. INTERSTATE, INTRALATA 1+ CALLING	9
V. 4-DIGIT CIC TRANSITION PERIOD	11
VI. CONCLUSION	12

Summary

In the instant reply comments, Sprint addresses five issues. First, it demonstrates that proposals to have limited rather than open membership on the NANP policy board/oversight committee are unworkable and potentially biased; that ATIS can, at least for a trial period, be the sponsor for the various NANP groups (the NANPA, the oversight committee, and the numbering forum); and that an independent, non-governmental NANPA should be chosen.

Second, Sprint shows that the funding mechanisms proposed by various parties based on "cost causation," future use, or current use of NANP resources, are all deficient and inferior to a funding mechanism based on the customer measures contained in the Budget Act of 1993.

Third, Sprint rebuts claims by certain LECs that a nationwide uniform dialing plan which uses "1" as a toll indicator is unnecessary.

Fourth, Sprint demonstrates why BOC claims that interstate intraLATA toll presubscription should be linked to their entry into the interLATA market are without merit and should be dismissed.

Fifth, Sprint explains why the 18-month transition period for conversion to 4-digit carrier identification codes proposed by some BOCs is unreasonably short, and urges the Commission to obtain additional information on subscribers' perceptions about the meaning and length of dialing

arrangements before making a decision about how long a transition period is needed.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

JUN 30 1994

In the Matter of)
Administration of the North)
American Numbering Plan)

FEDERAL COMMUNICATIONS COMMISSION
CC Docket No. 92-~~237~~ OF SECRETARY
Phases One and Two

REPLY COMMENTS

Sprint Corporation ("Sprint"), on behalf of Sprint Communications Company, L.P., the Sprint LECs (the United and Central Telephone Companies), and Sprint Cellular, hereby respectfully submits its reply to comments on issues relating to the administration of the North American Numbering Plan ("NANP"), filed June 7, 1994. Sprint responds to five issues raised by various commenting parties: the broad structure (administrative, policy, industry forum and sponsorship) that should be implemented to address NANP issues; the appropriate funding mechanism; the use of "1" as a nationwide uniform toll indicator; the alleged need to allow the BOCs into the inter-LATA market if the interstate intraLATA market is opened to competition; and the appropriate length of the 4-digit CIC transition period.

I. NANP Structure Issues

There is widespread agreement that NANP issues should be consolidated before a single organization; that the ministerial and policy aspects of NANP administration should be separate; that the new NANP administrator (NANPA) should be a neutral, non-governmental entity; and that decisions should be

made by the industry in an open fashion through the consensus process.¹ However, there are several issues relating to the numbering organization structure on which there is disagreement:

- whether the policy board/oversight committee should be limited to a specified number of industry representatives;
- whether the NANPA should assume responsibility for CO code assignment;
- who should sponsor the numbering organization and who should serve as NANPA.

A. Open Versus Representative Membership

At least three parties -- Nynex, Bell Atlantic and OPASTCO -- recommend that membership on a NANP policy board/oversight committee (OC) be limited rather than open to all interested parties. Nynex suggests (pp. 6-7) that the OC be composed of 10 LEC representatives, 5 IXC representatives, 2 wireless carrier representatives, and 1 CAP representative. Both Bell Atlantic (p. 4) and OPASTCO (p. 3) also suggest that the seats on the OC be limited and assigned to various industry segments, but do not recommend specific allocations.

These proposals for representative membership should be rejected. It is unlikely that individual service providers would be willing in all cases to allow one of their competitors to attempt to represent their interests. For example, a service provider may have future business plans that are

¹See, e.g., Sprint, pp. 2-9; Ad Hoc, pp. 4-7; AirTouch, pp. 2-3; AMTA, p. 4; APC, p. 2; Ameritech, pp. 2-5; AT&T, pp. 8-12; Bell Atlantic, p. 2; BellSouth, p. 2; CTIA, p. 4; GTE, p. 4; McCaw, pp. 3-4; MCI, p. 4; NARUC, p. 4; NATA, pp. 2-3; Pacific, p. 2; PCIA, pp. 3-4; SWB, pp. 3-6; Stentor, p. 3; US West, pp. 2-6.

affected by NANP resource decisions, that the service provider would not divulge to its OC representative; or, an issue which is of deep concern to one company may be given short shrift by its OC representative. Furthermore, it is not at all clear that the industry segments proposed by Nynex are appropriate. "Wireless" providers, for example, may include both cellular and PCS carriers, which may well have conflicting interests.

Indeed, Nynex's OC membership proposal can hardly be considered "representative" of the telecommunications industry. It offers no justification for its proposal that LECs as a group hold more seats than all other industry segments combined. By enabling LECs to dominate the oversight committee, Nynex's proposal would potentially re-create many of the problems which a neutral NANP organization was intended to counter.

B. Centralization of CO Code Assignment

Numerous parties urge that the new independent NANPA be given responsibility for CO code assignment.² However, several LECs oppose the centralization of this function and urge that LECs continue to administer these codes, at least for the immediate future.³

²See, e.g., Sprint, p. 5; Ad Hoc, pp. 6-7; Ameritech, pp. 4-5; AMTA, p. 6; APC, p. 2; GTE, p. 11; McCaw, pp. 3-4; MCI, p. 6; MFS, p. 4; OPASTCO, p. 4; PCIA, pp. 7-8; Teleport, pp. 3-5.

³See, e.g., Bell Atlantic, p. 2 (one year transition); Bellcore, p. 6; Nynex, pp. 9-11; Pacific, pp. 6-7; SWB, pp. 10-13; Stentor, pp. 6-7; US West, pp. 9-11; USTA, pp. 9-11.

Sprint is not opposed to a phased transition of CO code assignment responsibilities to the new NANPA, provided that such transition is begun promptly and completed within a reasonable time frame. Sprint agrees with various LECs which warn that the CO code administrator must be sensitive to local concerns and conditions, and aware of state and local regulations. However, it is unreasonable to allow LECs to continue to administer CO codes indefinitely. As MFS states (p. 4), because LECs are CO code users themselves, and are actual or potential competitors of other code users, allowing them to continue to assign such codes indefinitely gives rise to serious potential conflicts of interest.

C. Choice of Sponsor and NANPA

ATIS, NECA, and the FCC are each cited by various commenting parties as candidates to serve as the NANPA, or as sponsor for the NANP organization (the oversight committee, the NANPA, and the industry forum). Sprint continues to believe that ATIS should serve at least on a trial basis as the sponsor of the NANP organization, and that an independent third party be chosen (through an RFP) to serve as NANPA.

Parties supporting ATIS⁴ and NECA⁵ as potential sponsor and/or the NANPA cite their experience in dealing with numbering issues, their roles in established industry fora, and

⁴See, e.g., Sprint, p. 3; ATIS, p. 1; BellSouth, p. 2; Cincinnati Bell, p. 2; GTE, p. 4; MCI, pp. 7-8; Nynex, p. 8; OPASTCO, pp. 2-4; Pacific, p. 2; Southwestern Bell, p. 6; USTA, p. 6; US West, p. 2.

⁵See, e.g., AT&T, p. 13; NECA, pp. 14-16.

their administrative skills. NECA is a local exchange carrier organization. Since that alone is enough to create the appearance (and perhaps the reality) of conflict of interest, an expanded role for NECA in NANP administration is inappropriate. ATIS is the preferred sponsor because of its diverse (LEC and non-LEC) membership; however, because of its roots as an exchange carrier organization, Sprint had suggested in its comments (pp. 3-4) that ATIS' sponsorship be limited in duration to provide the industry with an opportunity to assess how well such sponsorship is working (see also, MCI, pp. 7-8 and CTIA, p. 3). If the NANP policy board, the industry forum and the NANPA are granted autonomy from ATIS, the possibility of discriminatory behavior on ATIS' part raised by various parties⁶ would seem to be minimized.

Allnet has suggested that the Commission should serve as the NANPA and rely upon a notice and comment cycle rather than industry fora proceedings to resolve numbering issues (p. 7). While Sprint agrees that the Commission should be actively involved in NANP issues (particularly in the policy arena), there is no reason for the Commission to serve as NANPA or as sponsor of the industry NANP groups (in terms of letting RFPs, handling the logistics of industry meetings, etc.). The Commission lacks the resources to take over these functions and what resources it does have are better devoted to such tasks as setting public policy, resolving disputes in the event of

⁶See, e.g., Ad Hoc, p. 4; AirTouch, p. 4; ALTS, p. 4; MFS, p. 3.

industry impasse,⁷ and reviewing and adopting (if appropriate) industry-developed guidelines.

II. Funding Mechanism

Commenting parties generally agree that whatever mechanism is adopted to fund Commission and industry NANP costs should be applied to all telecommunications service providers which use numbering resources, simple to implement, and competitively neutral. Funding based on the customer measures contained in the Budget Act of 1993 (presubscribed lines for IXCs, access lines for LECs, number of subscribers for cellular carriers and CAPs, etc.) would meet all of these criteria.⁸ Other funding mechanisms, including fees based on "cost causation," future uses, and current uses, have been proposed. As discussed below, each of these funding mechanisms is deficient in some way.

Some LECs suggest that funding fees be related to cost causation.⁹ However, it is not at all clear that cost causation can be reasonably determined, since many (perhaps even most) of the tasks associated with NANP administration benefit

⁷Several parties (see, e.g., APCC, p. 3; McCaw, p. 8; MCI, p. 10; and AT&T, pp. 11-12) suggest that a time limit be set on industry efforts to resolve a numbering issue, and that an issue be escalated from the industry forum to an arbitration body (an independent arbiter, the oversight committee or the Commission) once such time limit has elapsed. Sprint does not object to imposition of time limits since such limits may encourage prompt resolution and may be an effective means of preventing stonewalling.

⁸See Sprint, pp. 9-10; Southwestern Bell, p. 10.

⁹See, e.g., Ameritech, pp. 3-4; GTE, p. 14; US West, p. 7.

all parties. Whenever there is not a clear cost-causative relationship (as is the case here), the potential for discrimination in the allocation of costs exists. Thus, the safest option would seem to be to select a funding allocation basis which is readily measurable and available, and not subject to manipulation.

Bell Atlantic suggests (pp. 5-6) that the funding plan be "forward looking" and that there should be no fees associated with numbering resources "that have already been assigned and that are currently in use." This proposal would impose an extremely harsh burden on new service providers, and gives large existing users of numbering resources (such as the LECs) an unreasonable advantage.

Some parties propose that fees be based on an entity's current use of numbering resources.¹⁰ This proposal would place the greater burden on existing service providers, and thus is no more reasonable than the LEC proposals discussed above which burden new service providers and new service applications. In addition, it is unclear how these parties would determine a "fair" value for the NANP resources used by existing service providers.

¹⁰See, e.g., MFS, p. 6; Nextel, pp. 10-12; NARUC, p. 5 (allocation of costs should be based on factors such as the proportion of the resource used, the scarcity of the numbers involved, and the potential commercial value of any commercial use).

III. Use of "1" As Uniform Toll Indicator

Most commenting parties support use of "1" as a nationwide uniform toll indicator, noting that such an indicator minimizes customer confusion (callers are aware that they are making a toll call for which toll charges apply, and would know how to dial a toll call no matter what part of the country they are in); makes it simple to program CPE to restrict toll calling; promotes intraLATA toll competition; and increases the efficiency of the LEC network.¹¹

The only opposition to use of "1" as a toll indicator comes from a few LECs.¹² These LECs argue that local dialing plans reflect local conditions and policies, and that there will be some cost and confusion in converting to a uniform dialing plan. However, they do not explain what special circumstances may be present in their various jurisdictions which would preclude use of "1" as a toll indicator, nor do they attempt to weigh the cost and confusion of converting to a nationwide dialing plan against the cost and confusion of not having a nationwide dialing plan. Because the LEC allegations of unique local conditions and policies are completely

¹¹See, e.g., Sprint, pp. 10-13; Ad Hoc, pp. 9-13; API, pp. 2-4; AT&T, p. 6; Comptel, p. 4; MCI, p. 16; NARUC, p. 6 and Appendix A; NATA, p. 9; TCA, pp. 1-6.

¹²See, e.g., Ameritech, p. 6; Bell Atlantic, p. 6; GTE, p. 14; Pacific, p. 9; and US West, p. 11.

GTE states that "1" cannot be used as a toll indicator because with the advent of INPAs, "1" simply indicates that 10 digits (which may or may not signify a toll call) will follow. However, this is the very issue to be decided here, and GTE's comments simply confirm that uniformity is desirable.

unspecified, it is impossible to address their concerns or to determine whether use of "1" as a uniform toll indicator would in fact be contrary to state or local interests.

Pacific also argues (p. 10) that with number portability, callers will be unable to determine whether a call is local or toll. However, the "number portability" cited by Pacific is, by its own admission, a future concept. If the Commission adopts a nationwide uniform dialing plan, future dialing arrangements can be developed in a manner consistent with Commission policy.

IV. Interstate, IntraLATA 1+ Calling

Several of the BOCs oppose implementation of interstate, intraLATA toll presubscription on the grounds that to force them to take such action is somehow unfair when they are not allowed to provide interstate interLATA toll service.¹³ As Sprint explained in its comments (pp. 16-17), the MFJ's prohibition on BOC provision of interLATA toll services was based on their bottleneck control over exchange access facilities -- a bottleneck which still exists today and will persist for the foreseeable future. There is no reason to link interstate intraLATA toll presubscription to the lifting of the MFJ prohibition.

US West argues (pp. 20-23) that the current arrangements for interstate intraLATA toll are adequate, and that callers

¹³See Ameritech, pp. 9-11; Bell Atlantic, pp. 7-15; Missouri PSC, p. 3; Nynex, pp. 18-19; Southwestern Bell, pp. 16-18.

are not harmed, because US West charges rates which are "often" lower than those charged by IXCs. Ameritech similarly argues (p. 9) that the intraLATA toll marketplace is "currently competitive," and that "no stimulation by imposing a new presubscription requirement on this traffic is needed." However, neither US West nor Ameritech acknowledges the benefits of being allowed to strip 1+ intraLATA calls in their respective jurisdictions; nor do they offer concrete evidence (such as market share data) which would support their claims that the intraLATA toll market is already competitive. In any event, if US West and Ameritech are confident that their rates and service are attractive to interstate intraLATA toll callers in this purportedly fully competitive market, then they should not fear competition by IXCs on an equal footing with the BOC.

Bell Atlantic states (p. 15) that since IXCs would be "the sole beneficiaries of presubscription," the Commission would have to decide how IXCs "will pay for the costs they incur to implement presubscription." Sprint would note that the Commission has already decided that the costs of converting to equal access are endogenous under price cap regulation, and thus no explicit funding mechanism for these costs is allowed.¹⁴ In any event, the equal access costs incurred by

¹⁴*Policy and Rules Concerning Rates for Dominant Carriers*, 5 FCC Rcd 6786, 6808 (¶180) (1990). Of course, the FCC has jurisdiction only over interstate costs; thus, intrastate presubscription costs would be recovered in accordance with state regulations. Sprint has advocated that intrastate presubscription costs be allocated fairly among parties which benefit from this policy.

the LECs are likely to be minor, especially if, as Sprint has recommended, interstate intraLATA toll presubscription be required at the same time as a state regulatory agency orders 1+ presubscription for intrastate intraLATA toll calls.

V. 4-Digit CIC Transition Period

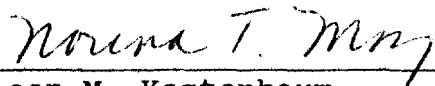
Proposals as to an appropriate permissive dialing period for conversion to 4-digit Feature Group D carrier identification codes (CICs) range from 18 months (BellSouth, Nynex, Pacific and Southwestern) to 12 years (APCC). Other parties (AT&T, NATA, OPASTCO) agree that 6 years is the minimum time necessary to effect a smooth conversion. While it is clear that a multi-year transition period is required, and that the 18-month period suggested by various of the BOCs is too short, it is not yet clear how long a transition period is appropriate and reasonable. Until some information on subscribers' perceptions about the meaning and length of dialing arrangements (an issue introduced at the Industry Numbering Committee) is available, any decision by the Commission as to the appropriate permissive dialing period would be somewhat arbitrary. Sprint therefore recommends that the Commission defer a decision on this issue until additional information is placed in the record, and that in the interim, the Commission require carriers to turn in their excess CICs and otherwise cooperate with Bellcore's CIC reclamation effort.

VI. Conclusion

For the reasons cited above, Sprint again urges the Commission to (1) adopt the NANP numbering organization structure suggested by Sprint in its initial comments; (2) require NANP funding contributions on the same bases as are contained in the Budget Act of 1993; (3) adopt a nationwide uniform dialing plan which uses "1" as a toll indicator; (4) dismiss BOC claims that interstate intraLATA toll presubscription should be linked to their entry into the interLATA market; and (5) dismiss BOC proposals to implement an unreasonably short transition period for conversion to 4-digit carrier identification codes.

Respectfully submitted,

SPRINT CORPORATION



Leon M. Kestenbaum
Jay C. Keithley
Norina T. Moy
1850 M St., N.W., Suite 1110
Washington, D.C. 20036
(202) 857-1030

June 30, 1994

CERTIFICATE OF SERVICE

I hereby certify that a copy of the "Reply Comments" of Sprint Corporation have been sent via U.S. First-Class Mail, postage prepaid, or Hand Delivery, on this 30th day of June, 1994 to the below-listed parties:

Richard Metzger, Chief*
Common Carrier Bureau
Federal Communications Comm.
1919 M Street, N.W., Room 500
Washington, D.C. 20554

Peyton Wynns*
Industry Analysis Division
Federal Communications Comm.
1250 23rd Street, N.W. #100
Washington, D.C. 20554

International Transcription
Service*
1919 M Street, N.W., Room 246
Washington, D.C. 20554

Larry Peck
Frank Panek
Ameritech
2000 W. Ameritech Ctr. Dr.
Hoffman Estates, IL 60196

Mark Rosenblum
Robert McKee
Albert Lewis
AT&T
Room 2255F2
295 N. Maple Avenue
Basking Ridge, NJ 07920

H. R. Burrows
Bell Canada
F4, 160 Elgin Street
Ottawa, Ontario
Canada, K1G 3J4

James Blaszak
Gardner, Carton & Douglas
1301 K Street, N.W.
Washington, D.C. 20005
Counsel for Ad Hoc

Michael Slomin
Bellcore
290 West Mt. Pleasant Ave.
Livingston, NJ 07039

Roy Morris
Allnet
1990 M Street, N.W.
Suite 500
Washington, D.C. 20036

Robert Sutherland
Shirley Ransom
BellSouth
4300 Southern Bell Center
675 W. Peachtree Street, NE
Atlanta, GA 30375

Jonathan Blake
Ellen Snyder
Covington & Burling
1201 Pennsylvania Ave., NW
P.O. Box 7566
Washington, D.C. 20004
Counsel for APC

Michael Altschul
CTIA
1250 Connecticut Avenue, N.W.
Suite 200
Washington, D.C. 20036

Marsha Olch
McCaw Cellular
5400 Carillon Point
Kirkland, WA 98033

Gregory Intoccia
Loretta Garcia
Donald Elardo
MCI
1801 Pennsylvania Ave., NW
Washington, D.C. 20006

Andrew Lipman
Swidler & Berlin
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007
Counsel for MFS

Daniel Brenner
David Nicoll
NCTA
1724 Massachusetts Ave., NW
Washington, D.C. 20036

David Cosson
Steven Watkins
NCTA
2626 Pennsylvania Ave., NW
Washington, D.C. 20036

William Cowan
NY DPS
3 Empire State Building
Albany, NY 12223

James Tuthill
Nancy Woolf
Pacific Telesis
140 New Montgomery Street
Room 1523
San Francisco, CA 94105

Werner Hartenberger
Dow, Lohnes & Albertson
1255 23rd Street, N.W., Ste. 500
Washington, D.C. 20037
Counsel for Cox

David Gudino
GTE
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

Darrell Townsley
Illinois Commerce Commission
160 N. LaSalle Street
Suite C-800
Chicago, IL 60601

Judith St. Ledger-Roty
Reed Smith Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036

Robert Lynch
Richard Hartgrove
Paul Walters
Southwestern Bell
1 Bell Center, Room 3520
St. Louis, MO 63101

Alex Harris
Teleport
1 Teleport Drive
Staten Island, NY 10311

Michael Senkowski
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006
Counsel for Telocator

Mark Goldberg
Unitel
2000 Wellington Street, West
Toronto, Ontario, Canada
M5V 3C7

Josephine Trubek
Rochester Telephone
180 S. Clinton Avenue
Rochester, NY 14646

Mary McDermott
USTA
1401 H Street, N.W.
Suite 600
Washington, D.C. 20005

Linda Hershman
SNET
227 Church Street
New Haven, CT 06510

David Henny
Whidbey Telephone Co.
2747 E. State Highway 525
Langley, WA 98260

Jeffrey Bork
U S West
1020 19th Street, N.W.
Suite 700
Washington, D.C. 20036

John Goodman
Karen Zacharia
Bell Atlantic
1710 H Street, N.W.
Washington, D.C. 20006

Paul Rodgers
Charles Gray
James Ramsay
NARUC
1102 ICC Building
P.O. Box 684
Washington, D.C. 20044

Pamela Riley
AirTouch Communications
425 Market Street
San Francisco, CA 94105

Albert Kramer
Robert Aldrich
Keck, Mahin & Cate
1201 New York Avenue, N.W.
Penthouse Suite
Washington, D.C. 20005

Susan Miller
ATIS
1200 G Street, N.W.
Suite 500
Washington, D.C. 20005

Theodore Pierson
Richard Metzger
Pierson & Tuttle
1200 19th Street, N.W.
Suite 607
Washington, D.C. 20036
Counsel for ALTS

Alan Shark
American Mobile
Telecommunications Assn.
1150 18th Street, N.W.
Suite 250
Washington, D.C. 20036

A. Lewis
CSCN
410 Laurier Avenue West
Box 2410
Station D, Floor 8
Ottawa, Ontario K1P 6H5

Anne Phillips
American Personal
Communications
1025 Connecticut Ave., NW
Washington, D.C. 20036

Lawrence Keller
Cathey, Hutton & Assocs.
3300 Holcomb Bridge Road
Suite 286
Norcross, GA 30092

Wayne Black
C. Douglas Jarrett
Joseph Sandie
Keller & Heckman
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
Counsel for API

Thomas Taylor
Christopher Wilson
2500 PNC Center
201 E. Fifth Street
Cincinnati, OH 45202
Counsel for CBT

Colleen Dale
Missouri PSC
P.O. Box 360
Jefferson City, MO 65102

Danny Adams
Jeffrey Linder
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

Paul Schwedler
Carl Wayne Smith
Defense Information Systems
Agency
701 S. Courthouse Road
Arlington, VA 22204

Robert Schwaninger
Brown & Schwaninger
1835 K Street, N.W.
Suite 650
Washington, D.C. 20006

Richard Askoff
NECA
100 S. Jefferson Road
Whippany, NJ 07981

Robert Schoonmaker
GVNW, Inc.
P.O. Box 25969
Colorado Springs, CO 80936

Douglas Kinkoph
LCI International Telecom
8180 Greensboro Drive
McLean, VA 20165

Leonard Kennedy
Laura Phillips
Dow, Lohnes & Albertson
1255 23rd Street, N.W.
Washington, D.C. 20037
Counsel for Nextel

Edward Wholl
Campbell Ayling
NYNEX
120 Bloomingdale Road
White Plains, NY 10605

Michael Senkowski
Jeffrey Linder
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006
Counsel for TCA

Lisa Zaina
OPASTCO
21 Dupont Circle, N.W.
Suite 700
Washington, D.C. 20036

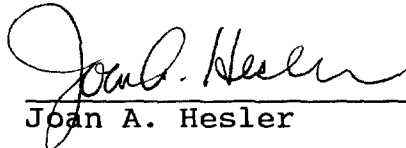
Charles Hunter
Kelly, Hunter, Mow & Povich
1133 Connecticut Avenue, N.W.
7th Floor
Washington, D.C. 20036
Counsel for TRA

Mark Golden
PCIA
1019 19th Street, N.W.
Washington, D.C. 20036

Raymond Bender
J.G. Harrington
Dow, Lohnes & Albertson
1255 23rd Street, N.W.
Suite 500
Washington, D.C. 20037
Counsel for Vanguard Cellular

Kelly Daniels
Karen Miller
Telco Planning, Inc.
808 The Pittock Block
921 S.W. Washington
Suite 808
Portland, OR 97205

Michael Hoffman
Vartec Telecom
3200 W. Pleasant Run Road
Lancaster, TX 75142


Joan A. Hesler

June 30, 1994

* Indicates Hand Delivery